

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-80053-AMC-2

UNITED STATES OF AMERICA,
Plaintiff,

v.

THOMAS PETER KATSAMPES,
Defendant.

_____ /

**RENEWED SECOND UNOPPOSED MOTION TO CONTINUE
CALENDAR CALL TRIAL AND EXTEND PRETRIAL DEADLINES**

COMES NOW, The Defendant, THOMAS PETER KATSAMPES (“KATSAMPES”), by and through undersigned counsel hereby files this Renewed Second Unopposed Motion to Continue Calendar Call, Trial, and Extend Pretrial Deadlines, and as grounds therefore states the following:

1. This matter is presently set for Calendar Call on January 7, 2025, and Trial on January 13, 2025.
2. Pretrial Motions and Motions in Limine are currently due by November 1, 2024.
3. The digital forensic report was not completed by the government and provided to counsel for the defense until last week Tuesday, October 22, 2024.
4. Due to deadlines in other cases last week and scheduled leave¹, undersigned counsel has not had the opportunity to review and discuss with the defendant the report as well as the discovery reviewed at the FBI office in West Palm Beach².
5. The parties are also exploring alternative resolutions in this matter.

¹ Undersigned counsel has been out of town since Monday, October 28, 2024, returning this evening.

² Since the forensic report had not been completed at the time of the initial discovery review, a subsequent, more in depth review would be necessary prior to filing pretrial motions should this matter proceed to trial.

6. To that end, the Government provided undersigned counsel with a draft plea agreement and factual proffer on October 22, 2024. Undersigned counsel needs additional time to review these documents with the Defendant and ensure all his questions and concerns are addressed, thereby safeguarding his Constitutional rights.
7. This is a serious matter and will require several meetings with the Defendant. The current pretrial motion deadline does not allow sufficient time for undersigned counsel to be effective in her representation of the Defendant.
8. In the event this matter is resolved in a plea, pretrial motions would be moot. It is for the sake of efficiency and judicial economy that undersigned counsel requests this continuance.
9. This motion is made in good faith and not for the purpose of delay.
10. Undersigned counsel has conferred with Assistant United States Attorney, Gregory Schiller, who has no objection to this request.
11. If the Court grants this request, KATSAMPES, by and through undersigned counsel, agrees the time from the filing of this motion until the new trial date is excludable under 18 U.S.C. § 3161(h)(7)(A) because the “ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.” Specifically, the continuance will allow undersigned counsel the opportunity to adequately explore the possibility of a plea resolution to this matter and litigate pretrial motions.

WHEREFORE, the Defendant, THOMAS PETER KATSAMPES, respectfully requests this Honorable Court grant this Renewed Second Unopposed Motion to Continue Calendar Call, Trial, and Extend Pretrial Deadlines for thirty (30) days. If this Honorable Court is inclined to

deny this renewed motion, the defense requests in the alternative, that this Honorable Court extend the deadline for pre-trial motions by 30 days and keep the current trial setting.³

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of October 2024, the undersigned electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

Respectfully submitted,

/s/ Kimberly Acevedo

Kimberly Acevedo, Esq.

Florida Bar No.: 286861

ROSENBAUM & ACEVEDO, L.L.P.

100 S.E. 2nd Street, Suite 3400

Miami, Florida 33131

Tel. (305) 446-6099

Fax. (305) 675-6156

Email: ka@rosenbaumacevedolaw.com

³ The Government has no object to this alternative relief.